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		n.
13	Attorneys for Defendants CORTEVA, INC., E.I. DU PONT DE NEMOU	RS
14	& COMPANY, DOW AGROSCIENCES LLC, THE DOW CHEMICAL CO., DOWDUPONT,	INC
15	n/k/a DUPONT DE NEMOURS, INC., and DO	
16		
17	UNITED STATES	DISTRICT COURT
18	NORTHERN DISTRI	ICT OF CALIFORNIA
19		
20	JASON CRAIG and MICHAEL ROSS,	Case No.: 3:19-cv-07923-JCS
21	individually and on behalf of all similarly situated current and former employees,	STIPULATION TO DISMISS CERTAIN
22	Plaintiffs,	DEFENDANTS WITHOUT PREJUDICE; AND [PROPOSED]
23	V.	ORDER
		Compleint Filed: 12/02/2010
<ul><li>24</li><li>25</li></ul>	CORTEVA, INC., E.I. DU PONT DE NEMOURS & COMPANY, DOW AGROSCIENCES LLC, THE DOW	Complaint Filed: 12/03/2019 Trial Date: Not set
26	CHEMICAL CO., DOWDUPONT, INC. n/k/a DUPONT DE NEMOURS, INC., DOW	
27	INC., and DOES 1 through 10, inclusive,	
	Defendants.	
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STIPULATION TO DISMISS CERTAIN DEFENDANTS WITHOUT PREJUDICE; AND [PROPOSED] ORDER Case No. 3:19-cv-07923-JCS

1	JASON CRAIG and MICHAEL ROSS (collectively "Plaintiffs") and CORTEVA, INC.,	
2	E.I. DU PONT DE NEMOURS & COMPANY, DOW AGROSCIENCES LLC, THE DOW	
3	CHEMICAL CO., DOWDUPONT, INC. n/k/a DUPONT DE NEMOURS, INC., and DOW,	
4	INC. (collectively "Defendants"), through their undersigned counsel, enter into this stipulation to	
5	dismiss certain named Defendants without prejudice.	
6	Plaintiffs filed a Complaint naming Corteva, Inc., E.I. Du Pont de Nemours & Company,	
7	Dow Agrosciences LLC, The Dow Chemical Co., DowDuPont, Inc. n/k/a Dupont de Nemours,	
8	Inc., and Dow Inc. The parties have met and conferred regarding narrowing the number of	
9	named defendants. The Dow Chemical Company acknowledges that for a portion of the relevant	
10	timeframe alleged in the Complaint it was Plaintiffs' employer. Dow Agrosciences, LLC	
11	acknowledges that for the remainder of the relevant timeframe alleged in the Complaint it is	
12	Plaintiffs' employer. Plaintiffs and Defendants now agree and stipulate that Corteva, Inc., E.I.	
13	Du Pont de Nemours & Company, DowDuPont, Inc. n/k/a Dupont de Nemours, Inc., and Dow	
14	Inc. will be dismissed without prejudice, with each party bearing its own fees and costs.	
15	Dated: February 27, 2020 HADSELL STORMER RENICK & DAI LLP	
16	By: /s/ Randy Renick (authorized on 2/26/20)	
17	Randy Renick Attorneys for Plaintiffs ASON CRAIG and MICHAEL BOSS	
18	JASON CRAIG and MICHAEL ROSS	
19	Dated: February 27, 2020 JACKSON LEWIS P.C.	
20	By: <u>/s/ Sander van der Heide</u> Sander van der Heide	
21	Attorneys for Defendants	
22	CORTEVA, INC., E.I. DU PONT DE NEMOURS & COMPANY, DOW	
23	AGROSCIENCES LLC, THE DOW CHEMICAL CO., DOWDUPONT,	
24	INC. n/k/a DUPONT DE NEMOURS, INC., and DOW, INC.	
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26	ATTESTATION	
27	I, Sander van der Heide, have obtained authorization and concurrence in the filing of thi	
28	document from Randy Renick, an attorney with Hadsell Stormer Renick & Dai LLP, attorneys of	

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1	record for Plaintiffs, which shall serve in lieu of his signature on the filed document. I have		
2	obtained and will maintain records to support this concurrence for subsequent production for the		
3	Court if so ordered or for inspection upon request by a party until one year after final resolution		
4	of the action (including appeal, if any).		
5	Dated: February 26, 2020 /s/ Sander van der Heide		
6	Sander van der Heide Attorneys for Defendants		
7			
8			
9	[PROPOSED] ORDER		
10	Based on the foregoing Stipulation and good cause appearing, the Court orders the		
11	following:		
12	1. Corteva, Inc. is dismissed without prejudice, with each party bearing its own fees and		
13	costs.		
14	2. E.I. Du Pont de Nemours & Company is dismissed without prejudice, with each party		
15	bearing its own fees and costs.		
16	3. DowDuPont, Inc. n/k/a Dupont de Nemours, Inc. is dismissed without prejudice, with		
17	each party bearing its own fees and costs.		
18	4. Dow Inc. is dismissed without prejudice, with each party bearing its own fees and		
19	costs.		
20	IT IS SO ORDERED.		
21			
22	DATED:  JUDGE JOSEPH C. SPERO		
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26 27			
<ul><li>27</li><li>28</li></ul>			
<b>40</b>	3		
	CTIDIU ATION TO DICMICC CEDTAIN DEFENDANTS WITHOUT DREHIDICE. AND		